

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
	:	
JERVAZZ BALLARD	:	
	:	
Debtor	:	BANKRUPTCY NO. 17-11010
	:	
	:	
US Bank, NA	:	
Movant	:	

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC
STAY FILED BY US BANK, NA**

NOW COMES JERVAZZ BALLARD, by and through his attorney Ashley M. Sullivan, Esquire, and hereby files an answer to the Motion for Relief from the Automatic Stay.

1. Admitted.
2. Admitted
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied.
7. Denied.
8. Denied. Debtor has sufficient funds to cure any present delinquency.
9. Denied.
10. Denied.
11. Admitted.

WHEREFORE, Respondent respectfully requests that Movant's Motion to Relief from the Automatic Stay be denied.

FREEDMAN AND LORRY, P.C.

BY: /s/ Ashley M. Sullivan

ASHLEY M. SULLIVAN, ESQUIRE
Attorney for Debtor

CERTIFICATION

Petitioner certifies under penalty of perjury that the matters stated herein are true and correct to the best of her knowledge, information, and belief.

DATE: November 9, 2017

ATTORNEYS FOR DEBTOR

/s/ Ashley M. Sullivan
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